

# Exhibit 1

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,  
Plaintiffs,

v.

RICK SNYDER, et al.,  
Defendants.

Case No. 5:16-cv-10444-JEL-MKM  
Hon. Judith E. Levy

---

**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF  
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH  
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA  
OPERATING SERVICES, LLC’S MOTION TO MOTION TO EXCLUDE  
EVIDENCE ABOUT VNA EMPLOYEES’ PERSONAL FEELINGS ABOUT  
THE FLINT WATER CRISIS AND WHAT THEY WOULD HAVE DONE  
DIFFERENTLY IN HINDSIGHT**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O’Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct excerpt of the transcript of the deposition of William Fahey.

3. Attached as Exhibit 3 is a true and correct excerpt of the transcript of the deposition of Mark Sanderson.

4. Attached as Exhibit 4 is a true and correct excerpt of the transcript of the deposition of Marvin Gnagy.

5. Attached as Exhibit 5 is a true and correct excerpt of the transcript of the deposition of Joseph Nasuta.

6. Attached as Exhibit 6 is a true and correct excerpt of the transcript of the deposition of Depin (Theping) Chen.

7. Attached as Exhibit 8 is a true and correct excerpt of the transcript of the deposition of Robert Nicholas.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on November 30, 2023  
Boston, Massachusetts

/s/ James M. Campbell  
James M. Campbell